

**UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
SUPERCOM, INC.,

Plaintiff,

-against-

**DEFENDANTS'  
RESPONSE TO  
PLAINTIFFS' LOCAL  
RULE 56.1 STATEMENT**

911INET LLC, JOHN DOE CORPORATIONS 1-5,  
D/B/A SPECIALTY LOCATION SERVICES,

Index No. 20-CV-8228  
(JSR)

Defendants.

-----X

Pursuant to Local Rule 56.1, Defendants hereby respond to the Local Rule 56.1 Statement of Plaintiffs, which was filed in support of Plaintiffs' Motion for Summary Judgment.

1. Defendants dispute this statement, in that there is no such business as Specialty Location Services (Affidavit of Javier Garcia dated December 16, 2021).

2. Defendants dispute this statement, in that there is no such business as Specialty Location Services, and there was no intent to induce Plaintiff into any act or omission (Affidavit of Javier Garcia dated December 16, 2021).

3. Defendants dispute this statement, in that there is no such business as Specialty Location Services (Affidavit of Javier Garcia dated December 16, 2021).

4. Defendants are without sufficient information to admit or deny this statement, and therefore dispute same.

5. The agreement speaks for itself.

6. The agreement speaks for itself.

7. The agreement speaks for itself.

8. The agreement speaks for itself.

9. Defendants are without sufficient information to admit or deny this statement, and therefore dispute same.

10. Defendants dispute this statement, as it is Defendants' understanding that third parties have returned the equipment at issue (Affidavit of Javier Garcia dated December 16, 2021).

11. Defendants are without sufficient information to admit or deny this statement, and therefore dispute same.

12. Defendants are without sufficient information to admit or deny this statement, and therefore dispute same.

13. Defendants dispute this statement (Affidavit of Javier Garcia dated December 16, 2021).

14. Defendants dispute this statement (Affidavit of Javier Garcia dated December 16, 2021).

15. Defendants dispute this statement (Affidavit of Javier Garcia dated December 16, 2021).

16. This statement is undisputed.

17. This statement is undisputed.

18. This statement is undisputed.

19. Defendants dispute this statement (Affidavit of Javier Garcia dated December 16, 2021).

20. Defendants dispute this statement, as the claimed amount is incorrect (Affidavit of Javier Garcia dated December 16, 2021).

21. Defendants dispute this statement (Affidavit of Javier Garcia dated December 16, 2021).

22. This statement is undisputed.

23. This statement is undisputed.

24. This statement is undisputed.

25. Defendants dispute this statement (Affidavit of Javier Garcia dated December 16, 2021).

26. Defendants dispute this statement (Affidavit of Javier Garcia dated December 16, 2021).

27. Defendants dispute this statement (Affidavit of Javier Garcia dated December 16, 2021).

28. This statement is undisputed.

Dated: Calverton, New York  
December 16, 2021

/s/ Todd Wengrovsky  
Todd Wengrovsky - TW4823  
Law Offices of Todd Wengrovsky, PLLC.  
285 Southfield Road, Box 585  
Calverton, NY 11933  
Tel (631) 727-3400  
Fax (631) 727-3401  
[contact@twlegal.com](mailto:contact@twlegal.com)  
*Attorney for Defendants*